

Deutsche Bank



Seth Waugh
Managing Director
Chief Executive Officer

Deutsche Bank Americas
31 West 52nd Street
New York, NY 10019

Tel 212 469 5646
Fax 212 469 6918

seth.waugh@db.com

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The Honorable William M. Thomas
Chairman, Committee on Ways and Means
U.S. House of Representatives
2208 Rayburn House Office Building
Washington, DC 20515-0521

Dear Mr. Chairman,

As a participant in the recent meeting with you and your staff, Deutsche Bank Americas was pleased to hear that when re-introduced your international tax reform legislation will delete the so-called "worldwide ratio," forego certain safe harbor proposals and continue the "netting" concept.

The worldwide ratio test (as well as the safe harbor proposals), as you recognize, would be completely unworkable for financial institutions given the role that leverage plays in our businesses. For us, restrictions on leverage are effectively a denial of a deduction for our cost of goods sold. We greatly appreciate your willingness to take our comments into consideration and the cooperation that you and your staff have shown us in regard to this important legislation.

Based on our current understanding and in light of the deletion of the unworkable worldwide ratio test and the continuation of "netting", Deutsche Bank Americas is happy to express its support for this modified legislation.

We look forward to reviewing the legislation when it is re-introduced, and to continue to work with you and your staff as it makes its way through the legislative process.

Sincerely,